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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CC FORD GROUP WEST, LLC,

Plaintiff,

v.

JENNIFER JOHNSON, CARRIE BICKING,
BETH WEILER, PROJECT VELOCITY, INC.,
PROJECT VELOCITY PARTNERS, LLC,
MEREDITH MANNING, PHARMAESSENTIA
USA CORP., MATTHEW ORNELAS-KUH, and
JOHN DOES 1-10,

Defendants.

CASE NO. 3:22-cv-04143

*DOCUMENT ELECTRONICALLY FILED
VIA CM/ECF*

**L. CIV. R. 78.1 MOTION DAY
MAY 5, 2025**

**PLAINTIFF'S NOTICE OF MOTION TO DEEM DEFENDANT SERVED
UNDER FED. R. CIV. P. 4(e) and (m) OR TO EXTEND TIME TO
SERVE DEFENDANT AND APPROVE SERVICE BY
ALTERNATE MEANS AND FOR FEES AND COSTS**

PLEASE TAKE NOTICE that on this 10th day of April 2025, Plaintiff CC Ford Group West, LLC ("Plaintiff," "CC Ford" or "CCFW"), by and through its undersigned counsel, Mandelbaum Barrett P.C., hereby move, to deem Defendant Matthew Ornelas-Kuh ("Defendant") served under Fed. R. Civ. P. 4(e) and (m), or in the alternate, to extend time to serve Defendant and approve service by alternate means, and for an award of costs and fees in Plaintiff's favor

(hereinafter, the “Motion”), before the Honorable Michael A. Shipp or the Honorable Tonianne J. Bongiovanni at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street Room 2020, Trenton, NJ 08608, on May 5, 2025, or another date and time to be determined by the Court.

By way of its Motion, Plaintiff respectfully moves the Court to deem Defendant served under Fed. R. Civ. P. 4(e) and (m), or in the alternate, to extend time to serve Defendant and approve service by alternate means. The plaintiff also respectfully moves for an award of costs and fees in its favor under Fed. R. Civ. P. 4(d)(2), Fed. R. Civ. P. 37 and/or all other applicable rules, authority and discretionary powers of the Court.

In support of this Motion, Plaintiff shall rely on the accompanying Memorandum of Law and supporting Declaration with exhibits, and any Reply, and supporting documents thereof, that Plaintiff may submit as necessary and pursuant to L. Civ. R. 7.1(d)(3).

Dated: April 10, 2025

Respectfully submitted,

/s/ Steven I. Adler

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of Plaintiff's Notice of Motion, Memorandum of Law in Support of the Motion and all accompanying documents and materials in support of the Motion including the supporting Declaration and Exhibits were served on all counsel of record as well as the below-listed counsel for Defendant via CM/ECF and/or electronic mail on this 10th day of April 2025:

Counsel for Defendant
William O'Conner, Jr.
1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, NJ 07962-2075
woconnor@mdmc-law.com

Dated April 10, 2025

/s/ Steven I. Adler

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Counsel for Plaintiff